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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

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|----------------------------------|---|----------------------------|
| Paeng See, |) | Case No. 1:24-cv-01516-GSA |
| Plaintiff, |) | STIPULATION AND ORDER FOR |
| vs. |) | EXTENSION OF TIME |
| Frank Bisignano, COMMISSIONER OF |) | |
| SOCIAL SECURITY ¹ , |) | |
| Defendant. |) | |

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 4-day extension of time, from May 12, 2025 to May 16, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION

¹ Frank Bisignano became the Commissioner of Social Security on May 6, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Frank Bisignano should be substituted for Leland Dudek as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. The case has recently been assigned to Plaintiff's Counsel to brief. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the week of May 12, 2025, Plaintiff's Counsel has four Merit briefs and a Reply brief due. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: May 9, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Dolly M. Trompeter
DOLLY M. TROMPETER
Attorneys for Plaintiff

Dated: May 9, 2025

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

By: */s/ Justin Lane Martin
Justin Lane Martin
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on May 9, 2025)

ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: **May 12, 2025**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE